

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN OPEN COURT
U.S.D.C. - Atlanta

MAY 23 2019

JAMES N. HATTEN, Clerk
By:
Deputy Clerk

UNITED STATES OF AMERICA

v.

PEDRO CHAIDEZ REYES

Criminal Action No.
1:19-mj-462

Government's Motion for Detention

The United States of America, by counsel, Byung J. Pak, United States Attorney, and John T. DeGenova, Assistant United States Attorney for the Northern District of Georgia, moves for detention under 18 U.S.C. §§ 3142(e) and (f).

1. Eligibility of Case

This case is eligible for a detention order because this case involves:

Any felony that is not otherwise a crime of violence but which involves the possession/use of a firearm, destructive device, or any other dangerous weapon;

A serious risk that the defendant will flee.

2. Reason for Detention

The Court should detain defendant because there are no conditions of release that will reasonably assure the appearance of the person as required and the safety of any other person and the community.

3. Rebuttable Presumption

The United States will not invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the appearance of the defendant as required and the safety of the community pursuant to 18 U.S.C. § 3142(e)(3).

The United States will not invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the safety of any other person and the community pursuant to 18 U.S.C. § 3142(e)(2).

4. Time for Detention Hearing

The United States requests the Court conduct the detention hearing after continuance of 3 days.

The United States requests leave of Court to supplement this motion with additional grounds or presumptions for detention.

Dated: May 23, 2019.

Respectfully submitted,

Richard Russell Federal Building
75 Ted Turner Drive S.W., Suite 600
Atlanta, Georgia 30303-3309
Phone: (404) 581-6000
Fax: (404) 581-6181
(404) 581-6201

BYUNG J. PAK
United States Attorney



JOHN T. DEGENOVA
Assistant United States Attorney
Ga. Bar No. 9406898

Certificate of Service

I served this document today by handing a copy to defense counsel:

Counsel

May 23, 2019

/s/JOHN T. DEGENOVA
JOHN T. DEGENOVA
Assistant United States Attorney